

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	
)	
v.)	
)	
RAEKWON DAC BLANKENSHIP,)	Criminal No. 20-170
)	
Defendant.)	Electronically Filed

MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS

AND NOW comes Defendant, Raekwon Dac Blankenship, by and through his attorney, Kelvin L. Morris, Esquire, and respectfully moves this Court for an extension of time for which to file pretrial motions upon the following basis:

1. Defendant, Raekwon Dac Blankenship, (hereinafter “Mr. Blankenship”) respectfully moves the court to extend the time to file pretrial motions and supporting briefs.
2. Pretrial motions are due on or before November 16, 2020.
3. Undersigned Counsel is still in the process of reviewing discovery.
4. Undersigned counsel recognizes the Court’s interest in avoiding unnecessary delays in the administration of criminal cases but due to the inability to fully review the discovery, undersigned counsel requests a sixty (60) day extension of time for the filing of pretrial motions, until January 20, 2021.
5. Granting the requested extension of time will permit review of relevant information

prior to the filing of pretrial motions and it will ensure Mr. Blankenship's rights to effective assistance of counsel and due process of law.

6. Mr. Blankenship concedes that all time that elapses as a result of the filing of this motion is excludable pursuant to the Speedy Trial Act.
7. Counsel for the United States of America, Assistant United States Attorney Jonathan Lusty, consents to the granting of the instant motion.

WHEREFORE, Defendant, Raekwon Dac Blankenship, respectfully requests the Court to grant him an extension of time until January 20, 2021 within which to file pretrial motions.

Respectfully submitted,

s/ Kelvin L. Morris.
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